

93 RF 3813.

EG&G ROCKY FLATS, INC.  
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

**93-RF-3813**

**FY 93 WORK PACKAGES FOR INDUSTRIAL AREA OPERABLE UNITS (OUs) - MBA-041-93**

EG&G Rocky Flats, Inc. (EG&G) is in response to the six concerns expressed in the above-referenced letter:

- 1 ) The Interim Measure/Interim Remedial Action Plan (IM/IRAP) for the Industrial Area (IA) at Rocky Flats Plant (RFP) is intended to be developed utilizing the existing data set. It is not required that the non-intrusive characterization activities support the IM/IRAP; however, as the IM/IRAP is developed, it will consider any newly available data generated by the non-intrusive activities. Indeed, the regulatory agencies have agreed that the non-intrusive field work would provide valuable information to support activities for the IM/IRA as well as transition and economic development. The non-intrusive activities and the IM/IRAP development will occur concurrently. It is not intended that these activities have a finish-to-start relationship. Therefore, an understanding of the data requirements for the IM/IRAP is not required for the field sampling plans of the Industrial Area OUs.
- 2 ) Soil gas surveys have been proposed within the scope of the IA OUs. EG&G acknowledges DOE's concerns about the timeliness of the soil gas surveys; however, they have been included in the non-intrusive investigations because they are considered useful components of the initial individual hazardous substance site (IHSS) screening. The surveys can also provide useful information for the coordination of activities with plant facility upgrades such as underground storage tank removal and replacement. Data generated from the non-intrusive field activities could support these upgrades and samples collected during construction activities including soil gas surveys, and could be utilized to minimize the intrusive activities scoped in the RFI/RI Work Plans. Additionally, the surveys will support the establishment of baseline values for the surveyed OUs. This may gain importance if DOE is considering economic development for certain areas.

Data collected in the soil gas surveys will be summarized in a Technical Memorandum. This will provide the basis for further sampling if necessary.

# ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCNI  
BY G. T. Ostdiek *820*  
DATE 5-5-93

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- 3 ) The surficial soil sampling program for the IA OUs is designed to meet the data quality objectives established in the work plans for the individual OUs. While it is intended that the IM/IRAP would use this data if it is available, this data is not necessary for the IM/IRAP to proceed or to be completed. Selective sampling may occur in FY 94; however, DOE guidance will be required for budget allocation, and for the continuation of the overall integrated approach to the industrial area.
- 4 ) The integrated industrial area surface water and sediment Field Sampling Plan (FSP) will be prepared through funds provided in Operable Unit No. 12. The implementation of the surface water and sediment FSP will be coordinated with decisions pending on the outcome of recent discussions with the regulatory agencies. Implementation of this FSP is planned for incorporation into the FY 94 budget.
- 5 ) Non-intrusive field activities for OU 9 are not planned for FY 93. The current funding levels in FY 93 will be utilized for additional data compilation and development of the Field Sampling Plan Technical Memorandum. The planned non-intrusive activities will be budgeted into the FY 94 Work Package.
- 6 ) Waste removal activities for IHSSs 170, 174 and 176 are currently underway. To date, scrap and surplus metals, empty drums, and certain surplus vehicles that have been stored in the property utilization and disposal (PU&D) yard have been removed. It is anticipated that all materials will be removed from the PU&D yard by June 1, 1993 in order to allow Phase I non-intrusive activities for OU 10 to begin as scheduled. If removal of waste and surplus items from the PU&D yard is delayed, the implementation of non-intrusive activities for the PU&D yard will have to be staged by performing non-intrusive work at other IHSSs within OU 10. This would allow additional time for waste removal efforts to be completed. Based on the current schedule for performing waste removal activities, it is anticipated that all work will be completed during FY 93, and will not overlap into FY 94.

EG&G would also like to apprise you of discussions that have taken place with the regulatory agencies regarding the IA IM/IRAP, and the IA Integrated OUs. On March 24, 1993, the IA IM/IRAP and the IA OU proposals were presented to the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH). The regulatory agencies were supportive of our efforts to integrate the remedial investigations within the IA, and indicated their approval to proceed with the non-intrusive sampling stages. The agencies also agreed with the need for an IM/IRAP; however, they have not indicated concurrence with our proposed scope for this project. While informal dialogue has been taking place for the past several months, this is the first formal meeting in which these proposals were presented to the agencies. It was agreed that open and frequent dialogue must continue on these proposals with the next meeting being scheduled in about two weeks.

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If you require additional information, please contact B. D. Peterman at extension 8659 or M. S. Buddy at extension 8519, both of Remediation Project Management.



M. B. Arndt  
Director  
Remediation Project Management  
EG&G Rocky Flats, Inc.

MSB:dmf

Orig. and 1 cc - J. K. Hartman

cc:

R. H. Birk - DOE, RFO  
R. J. Schassburger - "  
B. K. Thatcher, Jr. - "